

PATTI GOLDMAN (WSB #24426)  
AMY WILLIAMS-DERRY (WSB #28711)  
Earthjustice  
705 Second Avenue, Suite 203  
Seattle, WA 98104-1711  
(206) 343-7340  
(206) 343-1526 [FAX]  
pgoldman@earthjustice.org  
awilliams-derry@earthjustice.org

HONORABLE JOHN C. COUGHENOUR

*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

WASHINGTON TOXICS COALITION, )  
NORTHWEST COALITION FOR ) Civ. No. C01-0132C  
ALTERNATIVES TO PESTICIDES, )  
PACIFIC COAST FEDERATION OF )  
FISHERMEN'S ASSOCIATIONS, and ) DECLARATION OF PATTI GOLDMAN  
INSTITUTE FOR FISHERIES RESOURCES, )

Plaintiffs, )

v. )

ENVIRONMENTAL PROTECTION )  
AGENCY, and CHRISTINE TODD )  
WHITMAN, ADMINISTRATOR, )

Defendants, )

AMERICAN CROP PROTECTION )  
ASSOCIATION, et al., )

Intervenor-Defendants. )

DECLARATION OF PATTI GOLDMAN  
(C01-0132C) - 1 -

*Earthjustice*  
705 Second Ave., Suite 203  
Seattle, WA 98104  
(206) 343-7340

1 I, Patti Goldman, hereby state and declare as follows:

2 1. I am lead counsel in the above-captioned case.

3 2. I am attaching to this declaration true copies of the correspondence exchanged  
4 between counsel in the negotiations to produce a form of injunction, as ordered by the Court on  
5 August 14, 2003. The correspondence demonstrates that plaintiffs acted in good faith and made  
6 every effort to move the parties in the direction of an agreed-upon order. The correspondence  
7 also reveals obstacles to achieving that result and issues that could benefit from further direction  
8 by the Court.

9 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
10 and correct to the best of my knowledge. Executed this 3<sup>rd</sup> day of December, 2003, at Seattle,  
11 Washington.

12 /s/ Patti Goldman

13 PATTI GOLDMAN  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24